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13 **UNITED STATES DISTRICT COURT**  
14 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

15 ACE MARINE RIGGING & SUPPLY,  
16 INC.,

17 Plaintiff,

18 v.

19 VIRGINIA HARBOR SERVICES,  
INC., ET AL.,

20 Defendants.  
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No. SACV11-00436-GW (FFMx)

**NOTICE OF MOTION AND  
MOTION FOR AWARD OF  
ATTORNEYS' FEES AND  
REIMBURSEMENT OF  
EXPENSES**

Date: September 24, 2012  
Time: 8:30 A.M.  
Judge: The Honorable George Wu  
Ctm: 10

1 TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR  
2 ATTORNEYS OF RECORD:

3 PLEASE TAKE NOTICE that on Monday, September 24, 2012 at 8:30  
4 a.m., or as soon thereafter as Settlement Class Counsel may be heard, before the  
5 Honorable George H. Wu, United States District Judge, at the United States  
6 District Court for the Central District of California 90012, 312 North Spring  
7 Street, Courtroom 10, Los Angeles, California, Settlement Class Counsel hereby  
8 move the Court for an award of attorneys' fees and reimbursement of litigation  
9 expenses incurred. This Motion is brought pursuant to Fed. R. Civ. P. 23(h) and  
10 54(d)(2).

11 This Motion is made on the grounds that (a) such fees are fair and  
12 reasonable in light of Class Counsel's effort in litigating the Action and creating  
13 the Settlement Fund; (b) the requested fees comport with Ninth Circuit case law in  
14 common fund cases; and (c) the expenses for which reimbursement is sought were  
15 reasonably and necessarily incurred in connection with the prosecution of this  
16 Action.

17 In support of this Motion, Settlement Class Counsel rely upon the  
18 accompanying memorandum of law and declarations in support thereof, and based  
19 upon all matters of record including the pleadings and papers filed in this action  
20 and oral argument given at the hearing in this matter.

21 WHEREFORE, Settlement Class Counsel respectfully request the Court to  
22 grant this Motion and enter the attached form of Order.

23 Dated: August 3, 2012

/s/ Michael Goldberg

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*Interim Class Counsel, Chair of the  
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## Mailing Information for a Case 8:11-cv-00436-GW -FFM

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- (No manual recipients)

***Ace Marine Rigging and Supply Inc. v. Virginia Harbor Services Inc., et al.***  
**Case No. 8:11-cv-00436-GW -FFM**

**SERVICE LIST**

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